

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

)	
In the Matter of:)	
)	
Telecommunications Relay Services)	CG Docket No. 03-123
And Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	
)	
Structure and Practices of the Video Relay)	CG Docket No. 10-51
Service Program)	
)	
)	

**REPLY COMMENTS OF THE AMERICAN PREPAID
PHONECALL ASSOCIATION.**

The American PrePaid Phonecall Association (“APPPA”), hereby submits these reply comments in response to the *Public Notice* (the “*Notice*”)¹ in the above-captioned proceedings. APPPA is an industry association to promote prepaid phonecall products and to represent the interests of the companies who provide the services and the consumers who use them.

APPPA submits that the Commission should not allow the proposed increase in the Telecommunications Relay Services (“TRS”) Fund (the “Fund”) contribution factor to take effect. APPPA agrees with the many commenters who argue that the administrator’s demand projections are too high. APPPA also agrees with the commenters who stressed that Commission enforcement can help ensure that only legitimate demand is captured and funded.

¹ *Rolka Loube Saltzer Associates Submits Payment Formulas and Funding Requirement for the Interstate Telecommunications Relay Services Fund for the July 2013 through June 2014 Fund Year*; PUBLIC NOTICE, in CG Docket Nos. 03-123, 10-51 (rel. May 17, 2013) (the “*Notice*”).

We share Commissioner Pai's concern that the lack of safeguards "to ensure that the money spend by the Fund actually serves the intended beneficiaries of the program is not wasted."² The lack of controls and safeguards make this program vulnerable to abuse and fraud.

I. CONCLUSION

The dramatic increase proposed will adversely affect users of prepaid phonecall products. Such consumers are often recent immigrants who use prepaid products to call loved ones in their home countries and who often live at or below the poverty line. To avoid the harmful effects of the proposed increase, the Commission should not allow the proposed increase in the Telecommunications Relay Services Fund contribution factor to take effect.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gene Retske", with a long horizontal flourish extending to the right.

Gene Retske
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June 7, 2013

² *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24; *Telecommunications Relay Services for Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123